REMARKS

I.   Office Action Summary

In the Office Action dated June 21, 2007, the Examiner rejected claims 1-14. The Examiner objected to informalities in the drawings, specification and claims. Claims 1, 7 and 13 were rejected as indefinite under 35 U.S.C. §112, second paragraph. Finally, all of the pending claims were rejected as obvious over the combination of Experton (U.S. 5,995,965) and Cahill et al. (U.S. 5,940,844) under 35 U.S.C. § 103(a).

II.   Objection to the Drawings

Applicants submit herewith replacement drawings to address the informalities noted by the Examiner. No new matter has been added.

III.   Objection to the Specification

Applicants have amended the abstract to comply with the word count requirement.

IV.   Objections to the Claims

Applicants have amended objected-to claim 13 to address the Examiner's concern regarding grammatical issues.

V.   Rejections Under 35 U.S.C. § 112, Second Paragraph

Applicants have canceled claim 7 and amended claims 1 and 13 to clarify the language of their respective preambles. Claims 1 and 13 have been corrected to replace "equipment" with "devices" to address the antecedent basis issue noted by the Examiner. Accordingly, Applicants submit that this rejection is now moot.

VI.   Rejections Under 35 U.S.C. § 103(a)

Applicant respectfully disagrees with the Examiner's rejections of claims 1-14 as obvious in view of the Experton and Cahill references.

CLAIM 1

Amended claim 1 relates to a method for indexing data in a network based on unique identifiers. The method includes the steps of:

> **establishing a unique location identifier** for each of a plurality of data generating devices on a network, the unique location identifier **for identifying the location of each of the plurality of data generating devices in the network**;
>
> **registering the unique location identifier of each of the plurality of data generating devices on at least one server** connected to the network when the data generating device is first used on the network;
>
> **establishing a unique identifier for data generated by the data generating devices**;
>
> **registering the unique identifier** for data generated by the plurality of data generating devices **on the at least one server, wherein registering the unique identifier further comprises associating the unique identifier with a first unique location identifier**; and
>
> **associating**, at the at least one server, **the unique identifier associated with the first unique location identifier with a unique location identifier of a different data generating device in response to movement of data identified by the unique identifier** to the different data generating device.
>
> (emphasis added)

The method includes the feature of the data generating devices generating their own unique identifiers for data. This provides for a more dynamic and flexible tracking capability than the typical pre-designated, format-specific, centrally developed list of identifiers that common systems use, such as standard DNS servers. Also, by registering a unique identifier for data and a unique location identifier for a particular device that generated the data the method of claim 1 permits changing location of data without interrupting service. One example of this is illustrated in the specification at page 6, lines 10-14 which notes:

> "After recording information, the present invention tracks indices to locations of information. If the location of the device changes, that information could be tracked by the DDNS level 1 server so that queries could be automatically

rerouted to the location at which the device is currently housed. Thus the information can change as necessary while the index to access that information does not"

In contrast to the method of claim 1, Experton teaches a method to retrieve user records in which a smart card stores "activating data":

"The smart card then inputs **activating data** to the processor **202**. Unless the processor is already completely dedicated to the smart card of a single user, this activating data will include **user identification data**, which the processing unit verifies, for example, using a standard decryption routing.
Activating data will also include **remote network address data** which indentifies the network addresses) of each remote processing facility **300, . . . , 300***m* where the activating user's records and provider-requested records are stored. The network address data for user-requested records is preferably stored in the memory **140** of the smart card, so that it will be available to any processing units that the card is used to activate. The **network address data will include the address to the remote processing unit where each record is stored, as well as the sub-addresses** for the various request records within the respective remote processing unit" (Col. 8, II. 29-46) (emphasis added)

Thus, Experton teaches storing: (1) user identification data, (2) remote processing unit data, and (3) sub-addresses specific records. Experton therefore teaches remote retrieval of local records through an explicit list of enumerated addresses, identification information, and connection information saved on a smart card, but not unique identifiers and unique location identifiers that are maintained at a server. Accordingly, because the smart card of Experton contains static address information, if an enumerated address or sub-address changes, or changes location, access to the information with the changed address would be disrupted because the remote processing unit in Experton would need to notify all applicable smart cards and would not centrally associate a unique identifier with a different unique location identifier in response to the movement of the data as claimed.

Cahill discloses a system and method for storing and retrieving images such as images of checks. The Examiner has cited Cahill as allegedly establishing a unique device ID for data generating device. Cahill does teach a type of device ID, but rather than establishing a unique location identifier as claimed in claim 1, Cahill teaches the use of a "workstation ID" unique to the particular software application.

"The workstation ID must be correctly set to a the [sic] proper ID in the workstation software so that the host system **8** may properly identify the customer workstation **7** during communication therebetween. This is set at installation time, and generally requires no user modification" (Col. 48, ll. 14-18).

Cahill also lacks any teaching or suggestion of registering unique location identifiers of the plurality of data generation devices in the network in at least one server, or of associating unique identifiers with one or more different unique location identifiers when data is moved among different data generation devices in the network.

Neither of the cited references, alone or in combination, teach or suggest the steps of establishing and registering a unique location identifier of a data generating device, and establishing and registering unique identifiers for data generated by a data generating device with at least one server as claimed. Furthermore, neither of the cited references provides a mechanism for permitting data to be moved to a different location and tracking where that data has moved by associating a unique identifier with a unique location identifier of the new location in response to the movement of the data.

Because the cited references lack at least these features of claim 1, Applicants submit that claim 1 is allowable over the cited art. Claims 3-6 are dependent claims and are therefore allowable for at least the same reasons as discussed for independent claim 1. Reconsideration is respectfully solicited.

CLAIM 13

Amended claim 13 relates to method for storing and retrieving data based on unique identifiers and unique location identifiers maintained in at least one server in a network having a plurality of data generating devices. The method includes, *inter alia,*

establishing a unique location identifier for a respective one of the plurality of data generating devices on the network at the respective one of the plurality of data generating devices;

registering the unique location identifier on the at least one server when the respective one of the data generating devices is first used on the network;

generating a unique data identifier at the respective one of the plurality of data generating devices for data generated at the respective one of the plurality of data generating devices when the data is created;

storing on the at least one server an association of unique data identifiers for data generated by each of the plurality of data generating devices, and unique location identifiers of each of the plurality of data generating devices that generated the data identified by the unique identifier; and

the at least one server initiating a manipulation of an association of unique identifier and unique location identifier to change a unique identifier association from a unique location identifier of a first data generating device to a unique location identifier of a second data generating device, and instructing the first and second data generating devices regarding the change of unique identifier association.

(emphasis added)

As discussed with respect to claim 1, the cited references lack at least the feature of using unique IDs for data that are dynamically generated by the data generating devices themselves, as opposed to the predesignated, centrally created identifiers of the prior art. Additionally, unlike the cited references, claim 13 recites the step of the at least one server that handles the indexing (association of unique identifiers with unique location identifiers) initiating a change in the association of unique identifier and unique location identifier. Support for this feature of changing machines associated with data may be found in the specification at, for example, page 10, lines 3-11. Accordingly, because the cited art is missing at least the above-identified features, Applicants submit that claim 13 is allowable over the art of record. Claim 14 is a dependent claim and is therefore allowable for at least the same reasons as provided for independent claim 13.
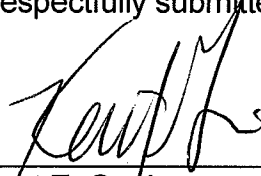
VII. New Claims 15-21

New claims 15-19 are dependent claims adding additional features and are fully supported by the specification as filed. New independent claim 20 recites a computer readable medium having programming code for carrying out a method similar to that of claim 1 and thus distinguishes over the cited references for at least the same reasons as provided for claim 1. New claim 21 depends from independent claim 21.

VIII. Conclusion

Applicants have amended claims 1, 3-6 and 13-14 to more clearly define the claimed invention. Although Applicants respectfully disagree with the rejections of claims 2 and 7-12, these claims have been canceled to expedite consideration and allowance of the remaining claims. Applicants reserve the right to submit the canceled claims in a continuation application. New claims 15-21 add to or clarify different aspects of the claimed invention. Applicants submit that no new matter has been added. In light of the above remarks and amendments, Applicants submit that claims 1, 3-6, and 13-21 are in condition for allowance. If any issues arise or questions remain, the Examiner is invited to contact the undersigned at the number listed below in order to expedite disposition of this case.

Respectfully submitted,

BRINKS HOFER GILSON & LIONE
P.O. BOX 10395
CHICAGO, ILLINOIS 60610
(312) 321-4200

Kent E. Genin
Registration No. 37,834
Attorney for Applicants